

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

MICHAEL P. GILMOR, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 4:10-cv-189-ODS
	)	
PREFERRED CREDIT CORPORATION, et al.,	)	
	)	
	)	
Defendants.	)	

**JOINT MOTION FOR EXTENSION OF TIME FOR EXPERT DESIGNATION DATES**

Pursuant to Fed. R. Civ. P. 6(b), Plaintiffs and Moving Defendants,<sup>1</sup> by and through their undersigned attorneys, request an extension of time to file their respective expert designation dates. In support of this motion, the parties state as follows:

1. The current expert designation dates are November 11, 2011, and December 30, 2011, for plaintiffs and defendants, respectively.
2. The parties are having difficulty scheduling an out-of-town deposition so that all necessary counsel can be present. Plaintiffs wish to have this deposition—currently noticed for three days--completed with sufficient time before their expert designation dates.
3. Counsel for the Preferred Trusts conferred with the Court's chambers in an attempt to start discovery dispute proceedings. The parties were asked to attempt to resolve the problem by extending the expert dates.

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<sup>1</sup> Moving Defendants include Impac Mortgage Holdings, Inc., Impac Funding Corporation, Impac Secured Assets Corp., IMH Assets Corp, Deutsche Bank National Trust Company, in its capacity as former trustee of certain trusts, Wells Fargo Bank N.A., in its capacity as former trustee of a certain trust, LaSalle National Bank, in its capacity as former trustee of a certain trust, Impac Real Estate Asset Trust Series 2006-SD1 and Litton Loan Servicing LP, Preferred Mortgage Trust 1996-1, Preferred Mortgage Trust 1996-2, Preferred Credit Trust 1997-1 and Deutsche Bank Trust Company Americas, in its capacity as trustee of these trusts (hereinafter "Moving Defendants").

4. After conferring the parties agreed that the dates could be moved to the following dates without affecting the close of discovery or the trial date:

- a. Plaintiffs' expert designation: December 5, 2011;
- b. Defendants' expert designations: January 23, 2011.

5. Counsel for the Preferred Trusts has conferred with counsel for all other defendants who have indicated that they do not objection to these dates.

6. In light of these facts, the undersigned counsel jointly respectfully request that the time for the expert designation dates be continued as set forth above.

Respectfully submitted,

October 12, 2011

/s/ Kip D. Richards

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 13, 2011, the foregoing was filed using the Court's CM/ECF system, which will notify all registered parties of the filing.

/s/ Leslie A. Greathouse